

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Delia Polanco §
Plaintiff §
v. § Case No.: 1:11-cv-07177-DAB-DCF
NCO Portfolio Management, Inc. §
Defendant §

**PLAINTIFF'S MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR
SUMMARY JUDGMENT AS TO LIABILITY:**

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